

IN RE:	:	
HEIDI ANN PLASIC	:	CASE NO. 1:24-02068-HWV
fka HEIDI ANN ANDERSON	:	
Debtor	:	CHAPTER 13
	:	
NATIONSTAR MORTGAGE LLC	:	
Movant	:	
	:	
v.	:	
	:	
HEIDI ANN PLASIC	:	
fka HEIDI ANN ANDERSON	:	
Respondent	:	

AND NOW, comes Debtor, Heidi Ann Plasic, by and through her attorney, Gary J. Imblum,
and respectfully responds as follows:

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9. Denied. Debtor's estate recently consulted a realtor. The realtor indicated that the property is worth approximately \$155,00.00. Accordingly, there is an equity cushion providing adequate protection to Movant. Debtor's estate plans to list the real estate for sale and sell it as soon as reasonably possible.

10. Admitted in part and denied in part. Strict proof is demanded as to fees and costs incurred.

11. Admitted in part and denied in part. Strict proof is demanded as to fees and costs incurred.

WHEREFORE, Debtor's estate respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: _____

11/11/24

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF NATIONSTAR MORTGAGE LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

BRENT J. LEMON, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

Respectfully submitted,

Carol V. Shay

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For Debtor

DATED: 11/11/2024